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June 28, 2023

Honorable Andrew T. Baxter
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

RE: RE: 5:20-cv-00489-GTS-ATB Compagni v. Town of Cortlandville, et al.

Dear Judge Baxter:

I am writing this letter to update you on the progress of our discovery at this time. We have completed the deposition of the Plaintiff and all of the named Defendants. Plaintiffs have conducted nine depositions and have one remaining deposition to do. This deposition is of attorney Matthew Neuman who has knowledge of significant facts in this case, particularly facts that have given rise to the Plaintiff's constitutional claims. Mr. Neuman has indicated that his first available date for this deposition is on July 21, 2023. At this time, I am asking that Your Honor allow the discovery cutoff in this case to be extended until after this date, which would also include Plaintiff's expert disclosure deadline. I have spoken with Mr. Gulisano and he is in agreement with this proposed extension and is contemplating additional depositions at this time.

Respectfully,



Jesse P. Ryder

CC: Philip Gulisano (via Efile)